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6 Attorney for RENEE HERMANN

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 THE UNITED STATES OF AMERICA,) No. 2:24-cr-00304-JAM
11 Plaintiff,)
12 v.) **FIFTH STIPULATION AND ORDER TO**
13) **CONTINUE STATUS CONFERENCE AND**
14) **EXCLUDE TIME**
15 FRANCISCO CORNEJO-QUEZADA,)
16 SHAWN ERIC MORALES, SR., and) Requested date: 2-10-2025
17 RENEE MICHELLE HERMANN,) Time: **9:00 a.m.**
18 Defendants.) Judge: Hon. John A. Mendez
19 =====)
20

21 It is hereby stipulated between the parties, Robert Abendroth, Assistant United States
22 Attorney, John Manning, attorney for defendant FRANCISCO CORNEJO-QUEZADA, Mark
23 Reichel, attorney for defendant SHAWN ERIC MORALES, SR, and Michael D. Long, attorney for
24 defendant RENEE HERMANN, that the status hearing set for October 21, 2025, at 9:00 a.m., before
25 Judge Mendez, should be continued and re-set for February 10, 2026, at 9:00 a.m., before Judge
Mendez.

26 Each party has agreed to move the status hearing, with the Court's permission, to February
27 10, 2026. All parties are available to appear, and they all agree to appear, in court in-person on
28 February 10, 2026, unless the defendant has a valid waiver of appearance on file.

29 The government has provided over 900 pages of discovery along with dozens of audio and
30 video recordings. Nearly all of the recorded materials (and text messaging) in this matter feature
31 conversations taking place in Spanish. The government recently provided (on, or about, September
32

1 30, 2025) several hundred pages of summaries related to both the recorded materials and text
2 messaging in this matter. The summaries are translated from Spanish into English. Additionally,
3 undersigned counsel for Mr. Cornejo-Quezada very recently provided the government with a
4 substantial informal discovery request. The government is contemplating their response to Mr.
5 Conejo-Quezada's requests. Additional time is necessary for the government to respond and once
6 the government does respond, for counsel to review the material.

7
8 Each party further stipulates that the ends of justice served by granting such continuance
9 outweigh the best interests of the public and of all the defendants in a speedy trial. Time has already
10 been excluded through October 21, 2025.

11
12 The request for extending the date for the status conference is at the specific request of each
13 of the defendants and with the knowing, intelligent and voluntary waiver of each defendant's speedy
14 trial rights under the law. The government agrees that a continuance is necessary. Good cause is
15 hereby shown.

16
17 For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et
18 seq., within which trial must commence, the time period from today's date to October 21, 2025,
19 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
20 because it results from a continuance granted by the Court at defendants' request on the basis of
21 the Court's finding that the ends of justice served by taking such action outweigh the best
22 interest of the public and the defendant in a speedy trial.

23
24 Dated: October 12 2025

Respectfully submitted,

25
26 /s/ Michael D. Long
27 MICHAEL D. LONG
28 Attorney for Renee Hermann

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/s/ John Manning
JOHN MANNING
Attorney for Francisco Cornejo-Quezada

/s/ Mark Reichel
MARK REICHEL
Attorney for Shawn Morales, Sr.

Dated: October 12, 2025

ERIC GRANT
United States Attorney

/s/ Robert Abendroth
ROBERT ABENDROTH
Assistant U.S. Attorney

ORDER

The October 21, 2025 Status Conference is **VACATED** and **RESET** for **February 10, 2026**, at **9:00 a.m.**, before Senior District Judge John A. Mendez.

Time is **EXCLUDED** through and including February 10, 2026, as described in the parties' Stipulation.

IT IS SO ORDERED.

Dated: October 14, 2025


JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE